

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:

California Palms Addiction Recovery  
Campus, Inc.

Debtor.

Case No. 22-40065 (JPG)

Chapter 7

Judge John P. Gustafson

**MOTION OF THE UNITED STATES TRUSTEE TO EXTEND  
DEADLINE TO FILE RESPONSE TO POST JUDGMENT MOTIONS**

Now comes Andrew R. Vara, the United States Trustee for Regions 3 & 9 (the “United States Trustee”), by and through his undersigned counsel, and hereby moves to extend the deadline for filing his response to the following motions: (1) *Motion to Alter or Amend the Judgment of Conversion to Correct Clear Errors of Law and to Prevent Manifest Injustice* (Docket No. 101); (2) *Motion To Stay Bankruptcy Court Order [Doc #94] Pending Appeal (Filed Before Appeal pursuant to Fed. R. Bankr. P. 8007(a)(2))* (Docket No. 102); (3) *Motion for Relief from Judgment* (Docket No. 103); and (4) *Motion to Suspend Chapter 7 Proceedings Pending Resolution of Post-Judgment Motions* (Docket No. 112)(collectively, the “Post Judgment Motions”).

Each of the Post Judgment Motions relate to this Court’s April 5, 2022 *Order Granting Motion of United States Trustee to Convert Case from Chapter 11 to Chapter 7* (Docket No. 88) and the United States Trustee intends to file an omnibus response to the motions. None of the Post Judgment Motions have been noticed for objection or hearing and, accordingly, out of an abundance of caution the United States Trustee requests an extension of the deadline for him to file an omnibus response to the Post Judgment Motions to the later of May 5, 2022 (fourteen days after the last filed motion) or such other date as set by the Court.

**WHEREFORE**, the United States Trustee respectfully requests that the Court extend the deadline for him to file his response to the Post Judgment Motions to the later of May 5, 2022 or such other date as set by the Court.

Respectfully submitted,

**ANDREW R. VARA**  
**UNITED STATES TRUSTEE**  
**REGIONS 3 AND 9**

By: /s/ Kate M. Bradley  
Kate M. Bradley (0074206)  
Trial Attorney  
United States Department of Justice  
Office of the United States Trustee  
201 Superior Avenue East, Suite 441  
Cleveland, Ohio 44114  
Phone: (216) 522-7800  
Fax: (216) 522-7193  
Email: [kate.m.bradley@usdoj.gov](mailto:kate.m.bradley@usdoj.gov)

and

/s/ Lauren C. Schoenewald  
Lauren C. Schoenewald (0097694)  
Trial Attorney  
United States Department of Justice  
Office of the United States Trustee  
201 Superior Avenue East, Suite 441  
Cleveland, Ohio 44114  
Phone: (216) 522-7800 ext. 250  
Fax: (216) 522-7193  
Email: [lauren.schoenewald@usdoj.gov](mailto:lauren.schoenewald@usdoj.gov)

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 25, 2022, a true and correct copy of the foregoing *Motion of the United States Trustee to Extend Deadline to File Response to Post Judgment Motions* was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Trevor G Covey    [tcovey@beneschlaw.com](mailto:tcovey@beneschlaw.com), [docket2@beneschlaw.com](mailto:docket2@beneschlaw.com)
- Frederic P. Schwieg    [fschwieg@schwieglaw.com](mailto:fschwieg@schwieglaw.com)
- United States Trustee    (Registered address)[@usdoj.gov](mailto:@usdoj.gov)
- Joshua Ryan Vaughan    [jvaughan@amer-collect.com](mailto:jvaughan@amer-collect.com), [SAllman@AMER-COLLECT.COM](mailto:SAllman@AMER-COLLECT.COM); [HouliECF@aol.com](mailto:HouliECF@aol.com)
- James A. Vitullo    [jamesavitullo@gmail.com](mailto:jamesavitullo@gmail.com)
- Kate M. Bradley ust44    [kate.m.bradley@usdoj.gov](mailto:kate.m.bradley@usdoj.gov)
- Lauren Schoenewald ust47    [lauren.schoenewald@usdoj.gov](mailto:lauren.schoenewald@usdoj.gov)
- Sebastian Rucci    [SebRucci@gmail.com](mailto:SebRucci@gmail.com)
- Andrew Suhar    [asuhar@suharlaw.com](mailto:asuhar@suharlaw.com)

And by regular U.S. Mail, postage prepaid, to:

California Palms Addiction Recovery Campus, Inc.  
1051 N. Canfield-Niles Road  
Austintown, OH 44515

By: /s/ Kate M. Bradley  
Kate M Bradley (0074206)  
Trial Attorney  
United States Department of Justice  
Office of the United States Trustee  
201 Superior Avenue East, Suite 441  
Cleveland, Ohio 44114  
Phone: (216) 522-7800 ext. 255  
Fax: (216) 522-7193  
Email: [kate.m.bradley@usdoj.gov](mailto:kate.m.bradley@usdoj.gov)